



U.S. Department of Justice

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May 13, 2022

The Honorable Kevin McNulty
United States District Judge
Martin Luther King Jr. U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: United States v. Willis Edwards, III
Crim. No. 20-572 (KM)

Dear Judge McNulty:

I have been assigned as a filter AUSA in connection with the above-referenced case. The Government writes to request that the Court set a deadline for counsel for non-parties Anthony Salters ("Salters")¹ and Shenandoah Adams Sr., a/k/a "Shane Adams Sr." ("Adams")² to complete their privilege reviews. Further delay in doing so will prevent the release to the Prosecution Team of any non-privileged records, which may constitute discovery materials to be produced to counsel for Mr. Edwards, and further delay proceedings in this case.

As background, the undersigned has entered into agreements with Salters, Adams and others, including Edwards, that govern the review of potentially privileged materials.

¹ On April 14, 2020, Salters was charged by complaint with subscribing to a false tax return for calendar year 2013. The Complaint alleged that Salters received checks issued by, among other parties, Edwards' employer, the City of Orange Township. On August 18, 2020, a grand jury returned an eleven-count Indictment, charging Salters with fraud and various tax offenses. That case, *U.S. v. Salters*, Crim. No. 20-710 (CCC), is pending before the Honorable Claire C. Cecchi. A trial date has not been set in Salters's case.

² On February 25, 2020, a grand jury returned an eight-count Indictment charging Adams with wire fraud and false statements in connection with a mortgage loan. The Indictment filed in *U.S. v. Adams*, Crim. No. 20-194 (ES) alleged, among other things, that Adams signed an agreement to do certain work for the Orange Public Library. On April 19, 2022, defendant Adams entered a plea of guilty to an Information, charging him with making and causing the making of false reports and statements to and for the United States Department of Housing and Urban Development with intent to defraud, in violation of 18 U.S.C. §§ 1012 and 2, and to Count 2 of the Indictment, charging the defendant with wire fraud, in violation of 18 U.S.C. §§ 1343 and 2. Sentencing is scheduled for September 29, 2022.

Counsel for Adams has repeatedly delayed his review of potentially privileged records, despite the fact that they were provided to counsel on or about July 30, 2021.³ Indeed, despite promising the Government multiple times that he would complete the review by dates certain that have come and gone, counsel has advised that he is only now in the process of loading the records into a database to facilitate his review of the records.

Counsel for Salters has not completed his review of potentially privileged materials despite the fact that the relevant records were turned over to him on May 12, 2021. Following repeated attempts to confirm a date certain for his review to be completed, on or about March 29, 2022, counsel advised that he has lost all of the privileged materials. On April 28, 2022, I re-produced the materials to counsel on a USB drive for Salters to review. I advised counsel that I expected his review to be completed within the five (5) weeks provided in the filter agreement. I was advised by counsel that he would “do his best.”

The undersigned now seeks a deadline for counsel for Salters and Adams to complete their respective privilege reviews. Further delays caused by Adams and Salters may negatively impact the Prosecution Team’s ability to meet its Rule 16 obligations to Mr. Edwards.

Very truly yours,

PHILIP R. SELLINGER
United States Attorney

/s/ Sophie E. Reiter

By: Sophie E. Reiter
Assistant U.S. Attorney

cc: Raymond Hamlin, Esq., Counsel for Anthony Salters
Shailesh Deshpande, Esq., Counsel for Shenandoah Adams Sr., a/k/a “Shane Adams Sr.”
Brandon Minde, Esq., Counsel for Willis Edwards, III
Roy B. Greenman, Esq., Counsel for Willis Edwards, III
The Honorable Claire C. Cecchi, United States District Court Judge

³ The privileged records were initially provided to prior counsel for Adams on or about February 18, 2020 and again to a different prior counsel on or about March 1, 2021.